

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SERVED AND FILED VIA ECF

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UNITED STATES OF AMERICA,		
		17 CR 641 (KMW)
-against-		
JUXHIN ULI, A.K.A. "GINO,"		
Defendant.		
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**SENTENCING MEMORANDUM OF DEFENDANT JUXHIN ULI**

Defendant Juxhin Uli, through his undersigned counsel, respectfully submits this Sentencing Memorandum for the Court's consideration in connection with his sentencing scheduled for October 30, 2018. In light of all of the factors enumerated in 18 U.S.C. § 3553(a), discussed in more detail below, defense counsel respectfully request that the Court impose a sentence of time-served (one day) to be followed by a three-year period of supervised release. Counsel would not be opposed to conditions of supervised release that amount to home confinement. This would permit Mr. Uli to continue his employment, care for his workers, and continue to love and look after the family which relies upon him for so much. Such a sentence would responsibly and justly address the Court's mandate to impose a sentence which is "sufficient, but not greater than

necessary” to meet the goals of the Sentencing Reform Act. Counsel recognizes that the sentence proposed is unusual for a case of this nature. However, as set forth below there is present in this case a combination of facts and circumstances that more than justify such a sentence as “sufficient but not greater than necessary” to satisfy the purposes of a just sentence for this offense and this offender.

In analyzing the appropriate sentence, it is, respectfully, essential that we all have in mind the limited role played by the Sentencing Guidelines. In terms of any thought that the Guidelines represent a somehow presumptively correct range, the Supreme Court has held precisely the opposite. In Nelson v. United States, 129 S.Ct. 890 (2009), the Court summarily reversed the Fourth Circuit which had upheld a district court’s application of a presumption of reasonableness to the guidelines:

[t]he Guidelines are not only *not mandatory* on sentencing courts; they are also not to be *presumed* reasonable.

*Id.* at 892. (Emphasis in original.) Thus, the guidelines are now only one factor to be considered in the formulation of a minimally sufficient individualized sentence.

When imposing sentence, the Court is required to consider the factors set forth in 18 U.S.C. § 3553(a)<sup>1</sup> in order to create an “individualized assessment”

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<sup>1</sup> The relevant factors are: (1) “the nature and circumstances of the offense and the history and characteristics of the defendant”; (2) “the need for the sentence imposed” to, inter alia:

based on a defendant's particular circumstances. Gall vs. United States, 552 U.S. 38, 49-50 (2007); see also United States v. Cavera, 550 F.3d 180, 188-89 (2d Cir. 2008) (en banc), holding that “[a] sentencing judge has very wide latitude to decide the proper degree of punishment for an individual offender and a particular crime.”

Thus, this Court has ample discretion to impose a sentence that takes into account the Guidelines, but relegates them to a single factor among many others. See Kimbrough v. United States, 552 U.S. 85, 101-10 (2007). In doing so, the Court may consider, and rely upon, any information available concerning the background, character, or conduct of the defendant. See Cavera, 550 F.3d at 189-91; see also 18 U.S.C. § 3661 (“No limitation shall be placed on the information concerning the background, character, and conduct of a person convicted of an offense for which a court of the United States may receive and consider for the purpose of imposing an appropriate sentence.”).

Moreover, in making an “individualized assessment,” the Court is not only empowered to impose a sentence below the Guidelines range, it is required to do so where a lower sentence would be sufficient to comply with the purposes of Section 3553(a). See, e.g., United States v. Dorvee, 616 F.3d 174, 183-84 (2d Cir.

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provide just punishment, deter criminal conduct, protect the public from any future crimes by the defendant, and provide the defendant with rehabilitative training and treatment; (3) “the kinds of sentences available”; (4) “the kinds of sentence and the sentencing range established” for the offense; (5) “any pertinent policy statement”; (6) “the need to avoid unwarranted sentence disparities among defendants with similar records who have been found guilty of similar conduct”; and (7) “the need to provide restitution to any victims of the offense.” 18 U.S.C. § 3553(a).

2010); United States v. Ministro-Tapia, 470 F.3d 137, 142 (2d Cir. 2006).

Moreover, as discussed above, the Guidelines carry no presumption of reasonableness.

This view is consistent with the long-standing principle that a Court consider “every convicted person as an individual” and that “the punishment should fit the offender and not merely the crime.” Pepper v. United States, 562 U.S. 476, 487-88 (2011). In sum, the overarching task of a sentencing court is to fashion a sentence that is appropriate for the individual circumstances of the offense and the defendant, and is “sufficient, but not greater than necessary” to achieve the statutory goals of punishment, deterrence, and rehabilitation. 18 U.S.C. § 3553. In this regard, it is noted this is Mr. Uli’s first conviction although he has had several business-related brushes with the law that are fortunately in the past and did not yield convictions.

Applying the principles discussed above to Mr. Uli should result in a sentence in line with that which is proposed.

1. The nature and circumstances of the underlying offense.

Stripped to its essential elements, the criminal conduct to which Mr. Uli entered a guilty plea may be summarized as follows. In a conversation with an acquaintance in a restaurant, Mr. Uli was told that the acquaintance was involved in drug distribution and that if Mr. Uli ever ran across someone with cocaine to sell, the acquaintance would be interested. That “someone” turned out to be another acquaintance with whom Mr. Uli was occasionally in contact at his

place of business in the Bronx. At the time, he was suffering business losses and in need of money to pay basic expenses. He then made the biggest two mistakes in his life by “middling” two one-kilo cocaine deliveries between the two individuals described above. For the first transaction he was paid \$1,000; for the second \$500.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

2. Juxhin Uli’s personal characteristics and family responsibilities support a sentence of time-served.

Submitted herewith for public docketing<sup>2</sup> is a minimally redacted appendix of letters from members of Mr. Uli’s family (his wife, mother and father), their parish priest, an acquaintance who is a member of the Mission of Albania to the United Nations, a member of the City Council of the City of New York, and a business associate. The letters are paginated A1-A7. Taken collectively, they describe a hard-working essentially decent man who cares

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<sup>2</sup> Counsel will be submitting under seal a supplemental submission and supporting materials describing the special needs of a family member for whom Mr. Uli cares. This is protected information not suitable for filing on the public docket.

deeply about and for the people around him, including the employees who depend upon him for their livelihood.

Probation describes Mr. Uli as a man with “a strong support system, specifically his wife and children . . . .” (PSR at p. 24.) This is more than borne out by Floria Uli’s heartfelt letter (A3) to Your Honor in which she describes her husband of nearly 20 years and the love and affection which unites this family of mother, father and three children, one of whom requires extra care. She notes that he has spoken frankly to his teen-age children about his transgression. She pleads poignantly for a sentence of non-incarceration highlighting the impact his absence would have on each of their three children, each one for special reasons. She also points out the impact of his incarceration on the business he runs and the economic well-being of not only his family but his many employees as well.

To the extent that Mrs. Uli and their children need a husband and father, his own mother and father present a compelling claim particularly for their son’s continued daily involvement in the father’s life. George Uli is ailing and frail and relies on his son for many of his daily needs.<sup>3</sup> (A2) This includes daily visits to the elder Mr. Uli’s home, while his wife is at work, where his son assists him in preparing meals and with the performance of life’s daily rituals. Mrs. Shpresa Uli, the defendant’s mother, corroborates how she and her husband’s lives will be forever changed for the negative if their son is not around to care for the

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<sup>3</sup> The father’s unredacted letter, describing his many ailments, will be submitted under seal.

father. (A1) Incarcerating Mr. Uli will further disrupt the lives of those who depend on him.

These simple statements from his family members as to how Mr. Uli handles his family responsibilities speaks volumes to his character. Probation further describes Mr. Uli as someone who “was forthcoming throughout his presentence review, has accepted responsibility for his actions related to the instant offense, and expressed remorse.” (PSR at p. 24.) In short, Mr. Uli’s demonstrated character traits support the recommendation of a time-served sentence. The proposed three-year period of supervised release will allow the Court ample opportunity to make certain Mr. Uli does not again stray.

The remaining letters lend further support to the sentence proposed. Father Pergini, the pastor of the Uli family’s church, describes Mr. and Mrs. Uli as “loving, caring and providing parents.” (A4) Father Pergini pledges his spiritual support for Mr. Uli and has encouraged him “never to lose hope” and views his parishioner as a “hard working young man who joyfully wants to commit his life for the good of his family and our society.” (*Id.*)

Further completing the picture of who Mr. Uli is and where he came from is the letter from Daniela Kristo Nesho, the Albanian Diplomat. (A6.) Mr. Nesho is aware of the circumstances of a journalist (Mr. Uli’s father) leaving Albania for a better life for his family the United States, while his mother abandoned her status as a well-known ballerina. Mr. Nesho recounts the circumstance of Mr.

Uli leaving college in the United States to go to work to assist his family in paying the bills.

The letter from Council Member Gjonaj (A7) further completes and reinforces this consistent portrait of an otherwise decent man who made a serious error in judgment mistake. Member Gjonaj underscores the negative effects of incarcerating Mr. Uli on family, friends and business.

Finally, there is a letter (A5) from a business associate, Simon Zikri, who attests to Mr. Uli's honorable character and work ethic. The two have worked together on many projects, including a major ongoing project involving the renovation of a hotel property in Manhattan. Mr. Uli was honest with his associate about his current difficulties. Mr. Zikri adds that, "If incarcerated his family would suffer financially and emotionally. His employees would be jobless, and I would be forced to forfeit the [hotel] project." (*Id.*)

Surely our sentencing law can find room for mercy and understanding in a case like this one. We are all better than the worst thing we have ever done. And that is emphatically the case with Juxhin Uli.

The Court's time and attention to this submission are appreciated.



## CONCLUSION

For all the foregoing reasons, it is respectfully requested that the Court impose a sentence of time-served.

Dated:       October 17, 2018  
                  New York, New York

/s/ David A. Ruhnke  
David A. Ruhnke, Esq.  
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## CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the above date this document was filed via ECF, thereby serving all parties.

/s/ David A. Ruhnke  
David A. Ruhnke, Esq.

The Honorable Judge Kimba M. Wood  
United States District Court  
Southern District of New York  
500 Pearl Street, New York, NY 10007  
October 16, 2018

Honorable Judge Wood,

Im writing on behalf of my son, Juxhin Uli. My son, is a hardworking and loving person, and it is unfortunate that he has gotten himself in this situation. I would have never in a million years believed that he would be foolish enough to make such a life changing mistake. We moved to the United States in 1990, when Juxhin was only 14 years old. It was difficult living in the Bronx with a teenage son because it was such a crucial time in his life. However, Juxhin was a strong willed boy and never got in trouble, he even began to work at a young age to help pay the bills at home. I was very hurt and found it hard to believe that at this time in his life, my son, a father of 3 children could break the law. Once he was arrested he explained to me that he made this choice out of desperation. He explained that after not being paid by KFC for renovating 3 stores in Florida and South Carolina he was broke and couldn't pay the bills. I should have known something was wrong when he sold his car to pay the workers. He had funded the whole job out of his own pocket in hopes of obtaining other stores to renovate.

The last 3 years overall have been rough for Juxhin. Im not trying to make excuses for him but the stresses have been overwhelming for the entire family. In 2015 a few months after his son was born, Juxhin was diagnosed with Mykosis Fungoides which is a type of lymphoma. It is non curable but can be controlled.

Then a few months later things went bad with the KFC stores, so as you can see it was a downward spiral and being arrested in front of his children was rock bottom. By this point his panic attacks were a daily routine. Sometimes when bad things happen they remind us to be more grateful and thankful for what we have. We remain optimistic about Juxhin's sickness, his panic attacks are being controlled with medication and his son has begun to speak and we just hope for the best with Juxhin's case.

You might say a mother will always stand by her child whether he is right or wrong and you would be right, even more so because he is my only child, but Juxhin is no ordinary person. He goes above and beyond for his family, employees and his community. He has always been a giving person. Whether it be a new soccer ball for his son, something he could only have dreamed of having growing up, to finding employees that he has fired, another job. He once caught an employee steal a wallet from a corporate store they were renovating, and after terminating him, turned around and helped him secure another job a week later. "He has to feed his children" he told me. It was then, that my forgiving son, made me a believer in second chances, not knowing that one day I would be fighting for his second chance. My son is not a drug dealer. He is a son that takes care of his father when he is ill, a son that surprises his mom at work with lunch, a husband that supports his wife's hopes and dreams and a father that will struggle to pay the bills, just so his children can go to a blue ribbon school and have opportunities in the future. If only you had the chance to know him in different circumstances you would know what I mean.

Your honor, I beg of you to be lenient with his punishment. Please allow him to remain out of prison because his family needs him financially and emotionally. We as a family would not only be devastated but would not be able to function day to day because he plays such important roles in our lives. My son checks in on his father daily and takes him to his doctors appointment while I'm at work. Juxhin is the sole provider in his household, as his wife only works part time. If he weren't around I would have to quit my job and stay home with my husband and wouldn't be able to pay my bills and I cant imagine how my daughter in law would pay the bills and care for my 3 grandchildren. Juxhin has expressed great regret for breaking the law and would continue to be the hardworking and giving person that he has always been.

Thank you for your time in reading this letter.

  
Shpresa Uli

August 20, 2018

The Honorable Judge Kimba M. Wood  
United States District Court  
Southern District of New York  
500 Pearl Street , New York, NY 10007

Honorable Judge Wood,

I am writing this letter to vouch for the character of my son, Juxhin Uli. Juxhin is a hard working man whom never gives up. He loves his family dearly and cherishes the opportunity he has been given to live the American dream. From day one of coming to the United States he wanted to own his own business and help others and he has never drifted from that.

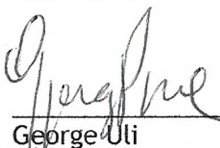
When I heard that my son was arrested I thought for sure that there was a mistake. There was no way that my son has done anything wrong. It wasn't until he was released later that day that he explained to me what had happened. I could not understand how someone who came to America with nothing and never committed a crime to get ahead would do something so stupid at this stage in his life. I don't know what was going through my son's mind when he committed this crime but what I do know and can guarantee is that he would never make a mistake like that again.

Juxhin plays a major role in all of our lives. At the moment, Juxhin supports his family with any profits from his construction company. If he is not around to financially support his family they will surely end up on the streets because my wife and I cannot support them. Juxhin also plays a major role in my life. My wife works 9am-6pm Monday thru Saturday and Juxhin takes care of me. [REDACTED]

[REDACTED] I have been sick for many years but things have worsened this last year. Juxhin comes to my apartment daily to make sure I take my 18 medications and cook or bring me lunch. He helps me to bathroom as well as assists me to take a shower. He also takes me to my Doctor's appointments. He is the only family member other than my wife who can help me with these day to day necessities. If Juxhin is not here to help me, my wife cannot work and we would be financially unstable.

As you can see he plays a major role in all of our lives. I know that he has committed a crime and I know according to the law he must be punished but I ask of you to please not send my son to jail. His entire family will be drastically affected. He is incredibly remorseful and is willing to do anything to make reparations. I hope that you take into consideration the power you have with regard to the future of this entire family, not just my son's, when making your final decision.

Respectfully,

  
George Uli

August 23, 2018

The Honorable Judge Kimba M. Wood  
United States District Court  
Southern District of New York  
500 Pearl Street , New York, NY 10007

Honorable Judge Wood,

Im writing on behalf of my husband Juxhin(Gino) Uli. He is a loving, supportive and hard working father and husband. I first met Juxhin in 1992 in church. His mother Shpresa, was my folk dance teacher at our cultural center, which was located in Bronx, N.Y. It wasn't until 1996 that we began dating and 3 years later we were married. We are now a family of five. Our oldest son [REDACTED] is 15 years old and attends Ardsley High School, he loves to read and play soccer. Our only daughter [REDACTED] is 13 years old and attends Ardsley Middle School. She is very athletic and plays Volleyball and Softball. [REDACTED] our youngest, who came as a complete surprise, 3 years ago, [REDACTED]. [REDACTED] Loves to play with his trains and go to the park. I am a full time mommy, house wife, part time bookkeeper for Gino's business as well as a part time receptionist at a dental office in White Plains, NY. We live very busy lives. We cherish any time we can go out to dinner together or just go for a walk in the park and watch the kids play.

Juxhin is an honest and generous person. Since a young boy he had a dream to open a non profit organization to help immigrant children and their families because he knew first hand the struggles when he came to the United States. This dream of his was put on hold because he had 3 children to raise. However, he found other ways to help immigrants. He provides jobs for them, trains them and takes them under his wing. Even though Juxhin is not a wealthy man, he makes an effort and buys his employees lunch daily. He always says "they work so hard all day, only a heartless person wouldn't feed them".

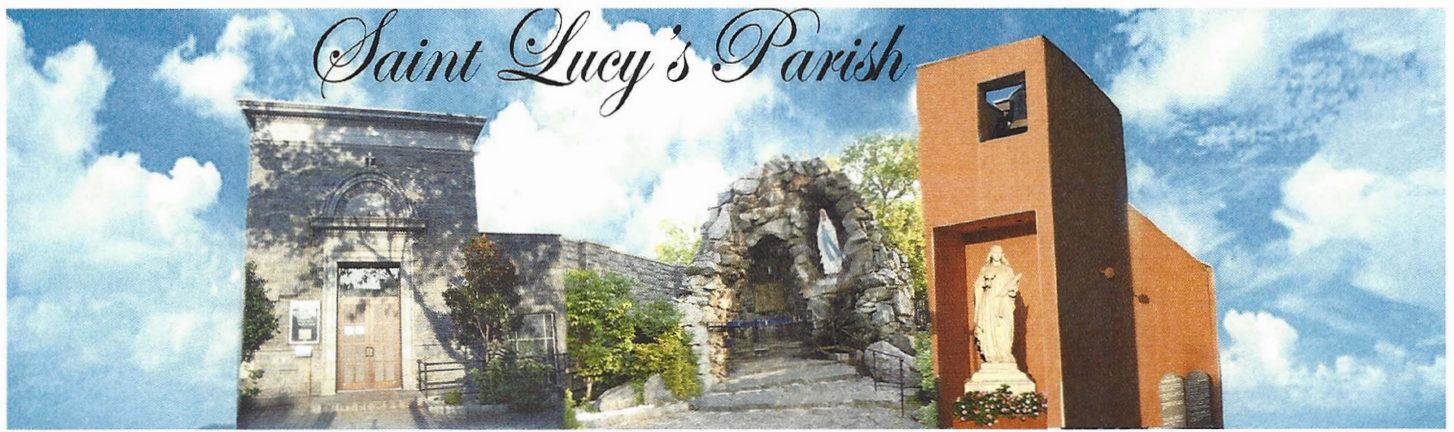
In the last few years my husband was taken advantage of and not paid on a few construction jobs which put a financial burden on his company. Throughout this stressful time he continued to pay his employees weekly even when it was his last few dollars. This circumstance, I believe, is what caused Juxhin to make a few bad decisions to make sure the rent was paid at home. My husband is not a career criminal. Yes, he did make a mistake and commit a crime but only because he was in a desperate state and felt he didn't have any other options at the moment. He knew he was wrong and confessed to me even before he was arrested. He has apologized to me and his parents numerous times for putting us through this ordeal. He has spoken with our teenagers and admitted that he has made some mistakes and that it is not acceptable by any means to commit a crime.

I understand the seriousness of the case, as does Juxhin, that is why he has done everything in his power to correct his wrong and help the Prosecutors office with any information that they needed. He has followed all the rules and restrictions of his release and of his pre trial officer. He has surely learned from this grave mistake and will be back on track to being the honest hardworking man I have always known. I beg of you not to incarcerate my husband. This past year has been punishment in itself. If he was sent away many will be affected by this punishment. The employees that have relied on him for jobs would be without work. His children will suffer. [REDACTED] is at an important stage in his life being a sophomore in high school and needs his role model to be around to cheer him on and help with schoolwork. [REDACTED] needs her daddy, her superhero to comfort her when she comes home from school after being teased by the boys for being so tall. [REDACTED] has just begun speaking and said daddy for the first time 2 months ago. If his daddy is not around I fear it will affect all the progress he has made this past year [REDACTED]. He will surely forget who "daddy" is if he is not here to kiss him every morning and night. As for me I need my rock by my side to whether the storms of life. I would not be able to work full time, pay the bills at raise 3 children on my own. Please, give him a second chance so that he can continue to provide for us.

Thank you for taking the time to read my letter.

  
Floria Uli





833 Mace Avenue ♦ Bronx, New York 10467 ♦ 718-882-0710 ♦ 718-882-8876 (Fax)

Sept 10, 2018

To Whom It May Concern

I, Nikolin Pergjini , Roman Catholic priest of archdiocese of New York, assigned pastor of St. Lucy's Parish, would like to write on behalf of Juxhin Uli.

I have come to know Mr. Juxhin Uli more than twenty five years. During these long years I have come to know him very well, his parents, his wife Floria and his children. I had the honor to baptize two of his children in my parish. During these years I have followed him and his family with much interest as a dedicated parents trying their best for them. They are honest and hard working couple of whom I am proud to have known them since their young age. I have followed them step by step as they grew up in years. And now as adult parents they are loving, responsible, caring, and providing parents. They have three beautiful children who are in good hands to grow and built a promising future because of their good example. I am very thankful and grateful to have him and his family as part of my life and to have known him as a person of honesty and integrity. As a priest and friend of his family I support him with my spiritual assistance and encourage him never to lose hope during this stressful and painful experience. I firmly believe that Juxhin Uli is an honest and hard working young man who joyfully wants to commit his life for the good of his family and our society.

If you have any questions regarding this information, please do not hesitate to contact me.

Sincerely,

  
Father. Nikolin Pergjini



September 7, 2018

The Honorable Judge Kimba M. Wood  
United States District Court  
Southern District of New York  
500 Pearl Street, New York, NY 10007

Honorable Judge Wood,

I, Simon Zikri, president of SR Renovations, am writing this letter to you to provide a character reference for Juxhin (Gino) Uli, who I know as a friend and colleague for the last 5 years. Juxhin is the owner of G and G General Contracting and we have worked on many projects in the last few years spanning from Florida to New York. He is a dependable and hardworking contractor which is a rare find. He has never let me down. He has completed extremely difficult projects on short deadlines and was always willing to travel outside of New York for work so he could provide for his family. I have gotten to know him very well the last few years as we have talked about future plans for our businesses and families.

Recently I was contracted by the Westgate Hotel, after they purchased a building located at 304 East 42 Street, New York, NY 10017, to do a full interior renovation. Being that I live in Florida, I needed a local contractor and immediately contacted Juxhin. That is when he confided in me about his troubles with the law. He explained that he fell behind with bills and wasn't able to make ends meet when a mutually known construction company didn't pay him on a few corporate jobs. While it is unfortunate that he has made some bad decisions, I can't help but imagine his desperation and what I would have done in his situation. He has expressed great remorse for his actions and his honesty with me has only strengthened our friendship. As of last week, we have already started the Westgate project together. Juxhin has the man power and the knowledge to handle this size project.

I ask the courts to be lenient with my friend and colleague on the grounds that he is needed by his family, employees and myself. If incarcerated his family would suffer financially and emotionally. His employees would be jobless and I would be forced to forfeit the Westgate project. During sentencing please keep in mind that Juxhin is an honorable man and has always been a upstanding citizen.

Best Regards,

A handwritten signature in black ink, appearing to be 'Simon Zikri', written over a horizontal line.

August 23, 2018

The Honorable Judge Kimba M. Wood  
United States District Court  
Southern District of New York  
500 Pearl Street, New York, NY 10007

Honorable Judge Wood;

I, Daniela Kristo Nesho, am writing this letter to provide a character reference for Juxhin Uli, whom I've known since he was born in 1975. I was surprised to hear of his recent case as he has always been a man of good moral character. I knew him in Albania while he was growing up and was reunited with him when I came here as wife of the Albanian Ambassador to the United Nations and again when I was appointed Permanent Mission of Albania to the United Nations. To know what kind of person Juxhin is it is important to know what kind of family he comes from. His father George was a journalist in the capital city Tirana and his mother Shpresa was a top ballerina in Tirana's cultural scene. Living in communist Albania Juxhin's parents wanted more opportunities for their only child and decided to leave their prestigious lives in Albania and come to America.

When the Uli family came to the United States Juxhin was only 15 years he was forced to learn the English language and fit in a society that was very different from the one he grew up in. Juxhin dropped out of Westchester Community College to work and help his parents pay the bills. He opened his first business in 1998 and has been self employed since.

Juxhin has 3 wonderful children with his wife of 19 years. He works very hard to provide his family with all the things that he could only dream of while growing up in Albania. He tries to instill in his children the family values that he has learned from his parents and grandparents. He is a great father, husband and son.

When I was asked to write this letter for him I didn't hesitate because I still believe he is an honorable man and a good human being. I am convinced that he has learned from this bad decision and how it has affected his family this last year. Please take into consideration my letter when deciding his family's fate, because ultimately his children and wife are the ones who will suffer in his absence.

Sincerely,



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Daniela Kristo Nesho  
Albanian Diplomat  
Permanent Mission of Albania to the United Nations  
Former Consul of Albania to USA (2012-2017)

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THE COUNCIL OF  
THE CITY OF NEW YORK  
**MARK GJONAJ**  
COUNCIL MEMBER  
13<sup>TH</sup> DISTRICT, BRONX

CHAIR  
SMALL BUSINESS  

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COMMITTEES  
GENERAL WELFARE  
HOUSING AND BUILDING  
IMMIGRATION  
JUVENILE JUSTICE  
PARKS AND RECREATIONS  
PUBLIC HOUSING

August 9, 2018

The Honorable Judge Kimba M. Wood  
United States District Court  
Southern District of New York  
500 Pearl Street, New York, NY 10007

Honorable Judge Wood

I am writing on behalf of Juxhin Uli. I have had the privilege of knowing Juxhin and his family for over 20 years. In the Albanian community it is very common to hear the story of parents who left their homeland (Albania) to come and provide their children with a better life in "America" Juxhin was only 14 years old when he came to the United States and managed to learn the language and open his first business when he was only 21 years old. His goals in life are to work hard, to provide for his family and take care of his parents as they have always done for him. His parents are also well involved in the Albanian community keeping the traditions alive in their family.

Juxhin has always been self-employed. He has been involved in the construction and restaurant business. He adds great value to our community with the jobs that he provides. He is a family man with three children ages 3-15 years old and happily married to his wife for 19 years. He has not been in any legal trouble in the past. For as long as I have known him he has worked very hard and took pride in everything he has done.

Juxhin has been an upstanding citizen since coming to the United States in 1991. If he were incarcerated his family would suffer greatly. His children's lives would be altered as they would not see him on a daily basis and be able to share their days to day stories with him. His wife would not be able to pay the bills at home and tend to 3 children alone. His businesses would cease to exist, in which those he has helped with jobs would suffer as well.

I am a firm believer in second chances and if anyone deserves it in my opinion it is Juxhin. I am pleading for you to be lenient with him and allow him to continue to provide for his family and contribute to the community.

Best regards,

Mark Gjonaj